

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
4

5 FEDERAL TRADE COMMISSION,

6 Plaintiff,

7 v.

8 NEXTCLICK MEDIA, LLC, ET AL.,

9 Defendant.  
10

CASE NO. C08-1718-VRW

AFFIDAVIT OF ALBERT CHEN  
PURSUANT TO SECTION XII OF  
THE STIPULATED PRELIMINARY  
INJUNCTION

11 Albert Chen hereby states and affirms:  
12

13 1. My name is Albert Chen. I am a citizen of the United States  
14 and am over the age of eighteen. I have personal knowledge of  
15 the matters discussed in this declaration, and if called as a  
witness, I could and would competently testify as to the matters  
stated herein. I am President of NextClick Media, LLC., a  
defendant in the above-captioned action.

16 2. My current business address is 303 2<sup>nd</sup> Street, Suite 375  
17 South, San Francisco, CA 94107.

18 3. Pursuant to Section XII of the Stipulated Preliminary  
19 Injunction in the above-referenced matter, a copy of the  
20 Stipulated Preliminary injunction has been provided to the  
following:

Company	Name	Title	Address	Telephone
Sunset Blvd	Greg Berard	President	9909 Topanga Canyon Blvd #304 Chatsworth, CA 91311	818-347-7800
UltraHerbal	Donna Fisher	Vice Pres./ Wholesale/ Mass Mrkts	350 N. Glenoaks Blvd 305 Burbank, CA 91502	800-756-3499 x302
Eye5	Tony Grebmeir	Founder	16742 Stag St. #101 Van Nuys, CA 91406	818-756-6800
Upsellit	Rusty Jenkins	Director of Business Development	811B Camarillo Springs Rd Camarillo, CA 93012	805-384-6974
TeleCPA	Andy Collins	Director of TeleCPA	437 East 1000 South Pleasant Grove, UT	801-785-7008

1			84062	
2	6 Star Ads	Jessica Mitchell	Affiliate Manager	8737 Great Hills Trail, Suite 350 Austin, TX 78759
3	AAMarketing	Nina Narang	Business Development Manager	1360 Louise Court Lake Zurich, IL 60047
4	AdFish	Leah Crain	Network Developer	1450 Veterans Blvd. Ste 100 Redwood City, CA 94063
5	Adknowledge	Heather Overley	Senior Account Manager	4600 Madison, 10th Floor Kansas City, MO 64112
6	Adteractive	Edwin Gackstetter	Business Development	303 Second Street, Suite 375 South San Francisco, CA 94107
7	Advaliant	Justin Tsang	Business Development	579 Richmond St. W Suite 100 Toronto, Ontario M5V 1Y6 Canada
8	Advent Online	BJ Shannon	Vice President	3131 Western Ave., Ste 401 Seattle, WA 98121
9	AzooglesAds	Chris Mentzer	Director of Sales, Mid Atlantic	140 Allstate Parkway, Suite #505 Markham, Ontario L3R 5Y8 Canada
10	Big Top	Mark Marrocco	Co-Founder	PO Box 1923 El Granada, CA 94018
11	BlinkAds	Tanya Alvarez		36 E. 23rd Street, 5FL R New York, NY 10010
12	Bloosky	Rob Nicolosi	Distribution Manager	PO Box 75466 San Clemente, CA 92673
13	Blue Phoenix	Mythina Brockington	Accounting	265 Canal St., Ste 509 New York, NY 10013
14	Cactus Media	David Weinberg	President	3250 W. Big Beaver Road, Suite 144 Troy, MI 48084
15	ClickBooth	Ziare Brown	Director of Media	301 N Cattlemen Road, Suite 3 Sarasota, Florida 34232
16	Commission Wizard	Unknown		840 S. Rancho Drive #4-705 Las Vegas, NV 89106

1	Consumer Track	Jeff Bartlett	Affiliate Manager	2381 Rosecrans Ave., Ste 336 El Segundo, CA 90245	310-297-9233 x227
2	Contact Fly	Allison Marotta	Affiliate Manager	101 Convention Center Dr, Ste 700 Las Vegas, NV 89109	858-638-1515 x14
3	Cover Click	Steven Haim	Affiliate Manager	112 West 34 <sup>th</sup> Street, Ste 1712 New York, NY 10120	646-652-3154 x31
4	CpaEmpire	Lou Difulvio		1490 W 121st Ave. Suite 201 Westminster, CO 80234	720-929-1978
5	CPAStorm	Nancy Colebank	Sales	2000 S Colorado Blvd. Tower 1 Suite 7000 Denver, CO 80222	303-327-2104
6	Cypra Media	Michael Quigley	VP, CES	4200 Saint Laurent, Suite 1010 Montreal, Quebec, Canada H2W 2R2	514 287 0458
7	DiabloMedia	Chris Clark	Affiliate Manager	1550 Larimer St. Suite 606 Denver, CO 80202	303.552.7241
8	eAdvertising	Jamie Olson	Business Development	201 Spear Street Suite 400 San Francisco, CA 94105	415-365-2856
9	EDebitPay	Roland Navarro	Affiliate Manager	15165 Ventura Blvd, Suite #200 Sherman Oaks, CA 91403	818-487-0672
10	Ethos Interactive	Leah Bradbury	President	21250 Hawthorne Blvd. Suite 500 Torrance, CA 90503	213-741-0617
11	Frontline	Allison Marotta	Affiliate Manager	101 Convention Center Drive, Suite 700 Las Vegas, NV 89109	858-638-1515 x14
12	FYC Direct	Jessica Mitchell	Affiliate Manager	8737 Great Hills Trail Suite 350 Austin, TX 78759	512-287-2167
13	GlobalWide Media	Mahmoud Halime	Bus Dev Assistant	31355 Oak Crest Dr. Ste 220 Westlake Village, CA 91361	514-287-0458 x 126
14	GRS	Danielle Hickey	Campaign Manager	150 S. Pine Islane Road, #52 Plantation, FL 33324	954-577-3033 x122
15	HiSpeedMedia	Phil Connelly	Affiliate Manager	15260 Ventura Blvd. Suite 1750 Sherman Oaks, CA 91403	818-990-0991
16	HydraMedia	Laurie Hansen	Account Exec	8800 Wilshire Blvd 2nd Floor Beverly Hills, CA 90211	310-6590-5755

1	IncentaClick	James VanderLinden	Team Lead - Sales	4445 Eastgate Mall, 2nd Floor San Diego, CA 92121	866-962-9764 x235
2	Intela	Colleen M. Flynn	Operations Manager	1495 Yarmouth Ave Boulder, CO 80304	303-473-0000 x227
3	Intermark Media	Alex dela Teja	Affiliate Partnership Manager	311 Crossways Park Drive Woodbury, NY 11797	631-719-1250
4	IronTraffic	Christian Baer	Sr. Account Executive	555 8th Avenue, Suite 1903 New York, NY 10018	
5	MaxBounty	Steven Sauve	Co-Founder	P.O. Box 593, Station Orleans Ottawa, Ontario K1C 1S9	613-834-3955 x222
6	MarketLeverage	Richard Phoebus	Advertising Manager	3300 W Lake Mary Blvd Suite 300 Lake Mary, FL 32746	407-323-5415
7	MediaWhiz	Julie Phok	Account Manager	75 Broad Street 23rd Floor New York, NY 10004	646-442-0079
8	MemoLink	Becky Morang	Controller	2000 S Colorado Blvd. Tower 1 Suite 7000 Denver, CO 80222	303-985-2627
9	Modern Consumer	Tyler Yocum	Affiliate Manager	270 Lafayette St. #201 New York, NY 10012	646-442-0661
10	Motive Interactive	Sarah Fuller	Account Manager	6020 Cornerstone Court West Ste. 280 San Diego, CA 92121	858-677-0792 x151
11	Netblue/Connexus	Judy Mormimoto	Account Manager	303 Bryant Street 3rd Floor Mountain View, CA 94041	650-810-1243
12	Neverblue	Steven Easton	Account Exec	Suite 302 852 Fort St. Victoria, B.C. V8W 1H8 Canada	250-386-5323 x269
13	OfferAlliance	Stephen Scanlon	Affiliate Director	5255 N. Edgewood Dr. Suite 225 Provo, Utah 84604	801-623-1708
14	OfferWeb	Brent Brague	Business Development	5190 Neil Road, Suite 430 Reno, NV 89502	954-551-9222
15	OfferFusion	George Torres	Account Exec	2020 Maltby Rd. Suite 7, #247 Bothel, WA 98021	800-618-6838
16	Panthera	Matthew Sandin	CEO	1611-A South Melrose Drive #122 Vista, CA 92081	818-416-0099
17	PMA Media Group	Stephen Scanlon	Affiliate Director	5255 N. Edgewood Drive	801-705-4400

1				Suite 225 Provo, UT 84604	
2	PrimaryAds	Tom Gianelli	Advertising Sales Manager	28050 US 19 N., Suite 509 Clearwater, FL 33761	727-324-0046
3	Promopath	Colin McIntyre	President	Attn: Accounting 6051 Wallace Rd, Suite 110 Wexford, PA 15090	408-416-0870 x0870
4	Pulse360	Jennifer Reppy	Account Exec	680 Fifth Avenue 10th Floor New York, NY 10019	866-947-8573
5	Qinteractive	Greg Seyller	Sup	One North Dearborn Street, 12th Floor Chicago, IL 60602	312-224-5000
6	QuinStreet	Matt Kramer	Affiliate Manager	1051 East Hillisdale Blvd Foster City, CA 94404	650-578-7700
7	Rapid Response	Kevin De Vincenzi		7500 West Lake Mead Blvd. #9-463 Las Vegas, NV 89128	702-300-3334
8	RR Media	Eddie Flores	Email Marketing Executive	20422 Beach Blvd., #400 Huntington Beach, CA 92648	714-960-9001 x11
9	Search Cactus	David Weinberg	President	3250 W. Big Beaver Road Suite 144 Troy, MI 48084	213-365-9880
10	Silver Carrot	Daryl Caldwell	Sales	132 West 36th Street 9th Floor New York, NY 10018	212-630-0234
11	SmileyMedia	Beau Gutierrez		PO Box 2759 San Ramon, CA 94583	512-480-9990 x105
12	SunShineMedia	Katie Crabs	Traffic Manager	6464 Sunset Blvd. Suite 819 Los Angeles, CA 90028	323-465-6102
13	Swish Marketing	Sarah Smith	Dir of New Business	405 El Camino Real, Suite 628 Menlo Park, CA 94025	510-384-6351
14	TightRope Interactive	Mark Marrocco	Co-Founder	PO Box 1923 El Granada, CA 94018	650-520-6638
15	TrafficNeeds	Scott O'Shea	Traffic Administrator	PO Box 2435 Dayton, NV 89403-2435	320-761-3186
16	Traffic Venue	Vivian Gastelum	Sr Campaign Mgr	1231 E. Dyer Road, Suite 255 Santa Ana, CA 92705	310-702-9977
17	Traffix	Jonathan Lender	Sales Rep	1 Blue Hill Plaza, 5th Floor PO Box 1665 Pearl River, NY 10965	845-620-1212



1	Tranzact Media	Paul Roberts	Acquired by RR Media	PO Box 75466 San Clemente, CA 92673	646-312-6012
2	Trustsource	Vanchau Nguyen	CEO	303 2nd St Suite 375 San Francisco, CA 94107	415-762-2266
3	The Useful	Meredith Jenners	Affiliate Manager	1613 NW 136th Ave Suite 100 Sunrise, FL 33323	561-674-9738
4	ValueClick	Mary Kate Lawlor	Account Manager	30700 Russell Ranch Road, Suite 250 Westlake Village, CA 91362	717-346-3622
5	VastCast	Rick Lea	List Mgr	8360 W. Sahara Ave. #240 Las Vegas, NV 89117	702-221-8261
6	Vinyl Interactive	Elina Manevitch	Media Buyer	1550 Bryant St Suite 738 San Francisco, CA 94107	415-503-2341
7	Vayan	Brian Foster	Sales Rep	213 W. Institute Place #610 Chicago, IL 60610	312-850-2793
8	Virtumundo	Ed Larson	Account Exec	PO Box 7768 Leawood, KS 66207-7768	816-419-3323
9	Webclients	Catharene Garula	Sales Rep	30699 Russell Ranch Road Suite 250 Westlake Village, CA 91362	717-346-3686
10	Webjuice	Ellis Go	Market Manager	2525 E. Charleston Rd. Suite 101 Mountain View, CA 94040	408-314-1738
11	880 Media	Alan Ting	Director of Operations	303 2nd St Suite 375 South San Francisco, CA 94107	415-762-2266
12	Datran/Storm post	Oksana Shushunova	Sr Account Manager	PO Box 7247-9284 Philadelphia, PA 19170-9284	212-706-4863
13	Lyris	Susan Barber	Account Manager	5858 Horton Street, Suite 270 Emeryville, CA 94608	800-768-2929 x1532
14	Topica	Walid Ezzeddine	VP, Customer Success	685 Market Street, Suite 300 San Francisco, CA 94105, USA	415-344-3897
15	Stun	Forrest Knighton	Digital Marketing Specialist	6565 Sunset Blvd. Ste. 200 Los Angeles, CA 90028	323-785-6304
16	Griffith Park	Justin Milgrim	CEO	4209 Santa Monica Blvd. Suite 100	323-660-0085

1				Los Angeles, CA 90029-3027	
2	Savicom	Bill Schmidt		44 Montgomery Street, 16th Fl. San Francisco, CA 94104	415-983-0990
3	Pexicom	Cliff Seltzer	CEO, Puresend	370 Lexington Avenue, Suite 1201 New York, NY 10017	646-862-5212
4	OptionsMedia	Amy Fleming	Account Manager	240 Old Federal Hwy, Suite #100 Hallandale, FL 33009	954-620-0242 x20
5	Cypra Media	Mohamed Hage	CEO	4200 Saint Laurent Street, Suite 1010 Montreal, Quebec, H2W 2R2 Canada	514-287-1010
6	YesMail	Patrick Fallarme	Account Manager	1155 North Service Road W. Unit #13 Oakville, ON L6M 3E3	905-338-8355 x270
7	NextClick Media	Albert Chen	President	303 Second St., Suite 375 South San Francisco, CA 94107	510-852-2828
8	NextClick Media	Michael C Stocker	VP, Marketing	303 Second St., Suite 375 South San Francisco, CA 94107	650-380-6888
9	NextClick Media	Jeff Hoang	VP, Technology	303 Second St., Suite 375 South San Francisco, CA 94107	408-569-1770
10	NextClick Media	Mark Kim	Software Engineer	303 Second St., Suite 375 South San Francisco, CA 94107	650-996-0438
11	NextClick Media	Wayne Chan	VP, Creatives	303 Second St., Suite 375 South San Francisco, CA 94107	510-585-5930
12	NextClick Media	Clark Siosan	Customer Service and Fulfillment	303 Second St., Suite 375 South San Francisco, CA 94107	650-455-5110
13	NextClick Media	Jack Huynh	Customer Service Specialist	303 Second St., Suite 375 South San Francisco, CA 94107	408-307-7314
14	NextClick Media	Shane Sareli	Director of Product	303 Second St., Suite 375 South San Francisco, CA 94107	650-255-2692
15	NextClick Media	Dylan Redling	Director, Ecommerce Merchandise Solutions	303 Second St., Suite 375 South San Francisco, CA 94107	415-572-5389
16	NextClick Media	Irene Lee	Senior Accountant	303 Second St., Suite 375 South San Francisco, CA 94107	408-505-5208
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

1	NextClick Media	Alan Ting	Program Manager	303 Second St., Suite 375 South San Francisco, CA 94107	510-332-3085
2					
3	NextClick Media	Benjamin Root	Software Engineer	303 Second St., Suite 375 South San Francisco, CA 94107	415-641-6146
4					
5	NextClick Media	Eric Choi	Marketing Operations	303 Second St., Suite 375 South San Francisco, CA 94107	510-507-0821
6					
7	NextClick Media	Benjamin Mullin	Software Engineer	303 Second St., Suite 375 South San Francisco, CA 94107	415-218-2234
8					
9	NextClick Media	Linda Kim	Marketing Operations	303 Second St., Suite 375 South San Francisco, CA 94107	510-417-0623
10					
11	NextClick Media	Jonathan To	Marketing Operations Specialist	303 Second St., Suite 375 South San Francisco, CA 94107	510-364-8091
12					
13	NextClick Media	Evan Brewer	IT Manager	303 Second St., Suite 375 South San Francisco, CA 94107	925-708-4075
14					
15	NextClick Media	Miguel Novey	Product Manager	303 Second St., Suite 375 South San Francisco, CA 94107	415-305-6894
16					
17	NextClick Media	Brian Bejarano	Marketing Operations	303 Second St., Suite 375 South San Francisco, CA 94107	214-208-0720
18					
19	NextClick Media	Kevin Hanson	Junior Creative Designer	303 Second St., Suite 375 South San Francisco, CA 94107	650-269-2969
20					
21	NextClick Media	Greg Nishikawa	Software Engineer	303 Second St., Suite 375 South San Francisco, CA 94107	503-442-7450
22					
23	NextClick Media	Debbie Wong	Sr. Account Manager	303 Second St., Suite 375 South San Francisco, CA 94107	408-507-3938
24					
25	NextClick Media	Kai Fortney	Marketing Operations	303 Second St., Suite 375 South San Francisco, CA 94107	603-867-0049
26					
27	NextClick Media	Stacy Tumarkin	Junior Accountant	303 Second St., Suite 375 South San Francisco, CA 94107	650-804-5860
28					
	NextClick Media	Brian Wang	Corporate Counsel	303 Second St., Suite 375 South San Francisco, CA 94107	626-512-2249
	NextClick Media	Geoffrey Beasley	Jr. Systems Administrato r	303 Second St., Suite 375 South San Francisco, CA 94107	925-285-4078



1 I hereby swear that the foregoing is true and correct.

2

3

4

Albert Date 5-7-08  
Albert Chen

5

6

7

SUBSCRIBED AND SWORN TO before me this 7<sup>th</sup> day of May,  
2008 by Albert Chen, *proved to me on the basis of satisfactory evidence to be the person who*  
*appeared before me.*

8

Tom Klein  
Print Name

9

10

Tony Klein  
NOTARY PUBLIC,  
STATE OF CALIFORNIA

11

12

Commission Number 1599459  
Seal

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

